

Harold R. Jones (State Bar No. 209266)
Gokalp Y. Gurer (State Bar No. 311919)
JACKSON LEWIS P.C.
50 California Street, 9th Floor
San Francisco, California 94111-4615
Telephone: (415) 394-9400
Facsimile: (415) 394-9401
E-mail: Harold.Jones@jacksonlewis.com
E-mail: Gokalp.Gurer@jacksonlewis.com

Attorneys for Defendant
STRAUMANN USA, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

BRET COCHRAN,

Plaintiff,

v.

STRAUMANN USA, LLC,

Defendant.

Case No. 2:22-cv-00768-JAM-DB

**AMENDED STIPULATION AND
ORDER TO MODIFY THE PRETRIAL
SCHEDULING ORDER**

Date of Removal: 05/05/2022
Complaint Filed: 03/07/2022
Trial Date: Not Set

Defendant STRAUMANN USA, LLC and Plaintiff BRET COCHRAN stipulate as follows and respectfully request that the Court modify the pretrial scheduling order (ECF Dkt. No. 10) for good cause pursuant to Federal Rule of Civil Procedure 16(b)(4):

1. Plaintiff filed the instant action in the Superior Court of California, County of Placer, on March 7, 2022. Defendant answered and removed the action to the U.S. District Court, Eastern District of California, on May 5, 2022.
2. The parties filed their joint Rule 26(f) report on July 1, 2022, proposing deadlines up to and including trial, and exchanged initial disclosures on August 16, 2022.
3. This Court granted the parties' first stipulation to modify the pretrial scheduling order on December 20, 2022 (ECF Dkt. No. 10). In the two and a half months since the Court's order, Defendant has produced additional documentation and the

parties are currently meeting and conferring to resolve outstanding discovery disputes in lieu of motion practice. The parties are requesting an additional two months for the parties to complete document production and to conduct depositions (approximately 10-15 witnesses in total), with the hopes of mediating the case in May or June.

4. THEREFORE, the parties stipulate and respectfully request that the Court modify the pretrial scheduling order as follows:

Event	Current Date	Proposed Date
Last day to disclose experts	March 16, 2023	May 12, 2023
Last day to disclose rebuttal experts	March 30, 2022	May 26, 2023
Discovery cut-off	May 18, 2023	August 18, 2023
Last day to file dispositive motions	July 14, 2023	October 13, 2023
Last day to hear dispositive motions	September 12, 2023	December 12, 2023
Final pretrial conference	December 8, 2023	February 9, 2024
Trial	January 22, 2024	March 25, 2024

IT IS SO STIPULATED.

Dated: March 17, 2023

JACKSON LEWIS P.C.

By: /s/ Gokalp Y. Gurer
 Harold R. Jones
 Gokalp Y. Gurer
 Attorneys for Defendant
 STRAUMANN USA, LLC

Dated: March 17, 2023

CASTLE LAW: CALIFORNIA
 EMPLOYMENT COUNSEL, PC

By: /s/ Timothy B. Del Castillo
 Timothy B. Del Castillo
 Lisa L. Bradner
 Attorneys for Plaintiff
 BRET COCHRAN

ORDER

Pursuant to the parties' stipulation and good cause appearing, the pretrial scheduling order (ECF Dkt. No. 10) is **MODIFIED** as follows:

Event	New Date
Last day to disclose experts	May 12, 2023
Last day to disclose rebuttal experts	May 26, 2023
Discovery cut-off	August 18, 2023
Last day to file dispositive motions	October 13, 2023
Last day to hear dispositive motions	December 12, 2023, at 01:30 PM
Final pretrial conference	February 9, 2024, at 10:00 AM
Trial	March 25, 2024, at 09:00 AM

IT IS SO ORDERED.

Dated: March 23, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE